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8 *Timothy Howard and William Miller*

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 THOMAS JENSEN,
12 Plaintiff,
13 v.
14 ADAM BRENDEL, et al.,
15 Defendants.

Case No. 3:16-cv-00407-MMD-CBC

**MOTION FOR EXTENSION OF TIME
TO FILE REPLY IN SUPPORT OF
MOTION FOR SUMMARY JUDGMENT**

16 Defendants, Adam Brendel, John "James" Buchanan, Timothy Howard and William
17 Miller (Defendants), by and through counsel Aaron D. Ford, Attorney General of the State
18 of Nevada, and Ian Carr, Deputy Attorney General, hereby submit their Motion for
19 Extension of Time to File a Reply in Support of the Motion for Summary Judgment. This
20 Motion is based on Federal Rule of Civil Procedure 6(b)(1)(A), the following Memorandum
21 of Points and Authorities, and all papers and pleadings on file in this action.

22 **MEMORANDUM OF POINTS AND AUTHORITIES**

23 **I. ARGUMENT**

24 Defendants respectfully request a twenty-one (21) day extension of time out from
25 the current deadline (June 17, 2019) to file a reply brief in support of the pending defense
26 motion for summary judgment in this case. Defense counsel is confronted with numerous
27 competing deadlines and a high workload due to staffing changes in the Office of the
28 Attorney General. However, such obstacles are currently being resolved and the

1 requested extension of time should afford Defendants adequate time file a reply brief
2 supporting the motion for summary judgment in this case.

3 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as
4 follows:

5 When an act may or must be done within a specified time, the
6 court may, for good cause, extend the time: (A) with or without
7 motion or notice if the court acts, or if a request is made, before
8 the original time or its extension expires; or (B) on motion made
after the time has expired if the party failed to act because of
excusable neglect.

9 Defendants' request is timely and its limited nature will not hinder or prejudice Plaintiff's
10 case, but will allow for more thorough briefing to narrow or eliminate issues prior to
11 further proceedings. The requested twenty-one (21) day extension of time should permit
12 Defendants time to file a reply brief in support of the pending defense motion for
13 summary judgment. Defendants assert that the requisite good cause is present to
14 warrant the requested extension of time.

15 For these reasons, Defendants respectfully request a twenty-one (21) day extension
16 of time from the current deadline to file a reply brief in support of the summary judgment
17 motion, with a new deadline to and including Monday, July 8, 2019.

18 DATED this 17th day of June, 2019.

19 AARON D. FORD
20 Attorney General

21 By: 

22 IAN E. CARR
23 Deputy Attorney General
24 State of Nevada
25 Public Safety Division
26 *Attorneys for Defendants*

27 IT IS SO ORDERED.

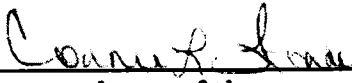
28 
U.S. MAGISTRATE JUDGE

DATED: 6/19/2019

CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 17th day of June, 2019, I caused to be served a copy of the foregoing, **MOTION FOR EXTENSION OF TIME TO FILE REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT**, by U.S. District Court CM/CFE Electronic Filing to:

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